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May 8, 2020

File No. 27565.501

VIA U.S. MAIL

Honorable Judge Cam Ferenbach
333 Las Vegas Blvd South
Las Vegas, NV 89101

Re: *Alvarado-Herrera v. One Way Trucking*
US District Court, Nevada Case No. 2:19-cv-00745

Honorable Judge Ferenbach:

Please allow this to provide you with an update regarding the progress of the parties submission of an updated Stipulated Discovery Plan. Pursuant to the hearing on February 6, 2020, and this Court's Minute Order (Docket No. 43), the parties were to submit the same by April 27, 2020. The updated Discovery Plan is necessary due to the Plaintiff's recent filing of an Amended Complaint to add R&R Express, Inc. as an additional defendant.

At this time, R&R Express, Inc. has not entered a formal appearance, but the undersigned counsel has been in contact with its carrier and understands that they are in the process of confirming retention of counsel on its behalf. On that basis, Plaintiff's counsel has agreed to an extension for R&R Express, Inc. to file a responsive pleading until May 15, 2020. As such, counsel for the parties have conferred and agreed that it would be prudent to await an appearance on behalf of R&R Express, Inc. before submitting the Discovery Plan so that counsel on behalf of R&R Express, Inc. can be involved in discussions regarding the new proposed deadlines.

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Accordingly, the parties would request that this Honorable Court permit an extension for submission of an updated proposed Discovery Plan until June 1, 2020. We appreciate the Court's attention to and consideration of the issues outlined herein. Please advise if the requested extension is acceptable and/or if you if you would like to schedule a conference with the parties to discuss the same.

Sincerely,

/s/ Sarah B. Hartig

Darrell D. Dennis of
Cory R. Eichelberger of
Sarah B. Hartig for
LEWIS BRISBOIS BISGAARD & SMITH LLP

DDD/CRE/SBH
cc: Taylor Anderson, Esq.